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March 4, 1998

Ms. Nancy Boocker
Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 5002
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Boocker:

Enclosed please find copies of letters addressed to three TTY manufacturers. It was the consensus of the members at the last TTY Forum that a communication be sent to all TTY manufacturers urging their attendance and support at all future TTY Forum meetings suggesting that a solution cannot be reached without their active participation. It was further agreed that a copy be forwarded to your bureau for information purposes only.

Should you have any questions please contact me at 202 736-2359

Respectfully,

E.A. Hall

CTIA

AVP for Technology and Network Operations

cc. Dan Phythyon
John Cimko

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List ABCDE

February 18, 1998

Mr. Ron Schultz
Vice President for Quality & Compliance
Ultratec
450 Science Drive
Madison, WI 98033

Dear Ron,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

Successfully implementing the E911-TTY compatibility requirement requires a two-part solution. Both the manufacturers of telecommunications equipment and the manufacturers of text telephones must share the burden of ensuring compatibility with each other's products. As the industry has experienced with the wireless Hearing Aid Compatibility ("HAC") issue, if there are two products which have inherent problems operating together, the responsibility to resolve the problem should be shared between the two parties. In this case, FCC involvement was useful in bringing the hearing aid manufacturers and wireless phone manufacturers together.

Wireless manufacturers and operators are accustomed to regulatory oversight by the FCC, and understand the importance of complying with Commission mandates. However, we recognize that TTY manufacturers do not share the same historical experience with the Commission. We believe that under the new federal guidelines (Section 255 of the Telecommunications Act), TTY (CPE) manufacturers have a legal obligation to make their equipment accessible and/or compatible with other commonly used telecommunication equipment. Therefore, while TTY manufacturers do not fall under regulatory obligation under the E911 rules, TTY manufactures should be expected to participate in the E911 activities because of their obligations under Section 255. If we are to meet the requirement of passing TTY emergency calls over digital wireless phones, your participation is critical. The fourth TTY/digital wireless compatibility forum will be held on April 1st and 2nd in the Washington, D.C. area. Please contact Janette Stout at (202) 736-3224 for further information. We look forward to working with you in the months ahead.

Respectfully yours,

Ed Hall CTIA Mary Madigan

February 18, 1998

Mr. Sidney Ander Executive Vice President Krown Manufacturing, Inc. 3115 Lackland Road Fort Worth, TX 76116

Dear Mr Ander,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

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Respectfully yours,

Ed Hall CTIA

Mary Madigar

February 18, 1998 -

Mr. George Cheung
Ameriphone
12082 Western Avenue
Garden Grove, CA 92641-2990

Dear Mr. Cheung,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

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Respectfully yours.

Ed Hall

Mary Madigan

PCIA